

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO. 08-170
v.	*	SECTION: "C"
KENDELL JACKSON	*	
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	*	

FACTUAL BASIS

Should this matter proceed to trial, the United States will prove beyond a reasonable doubt, through credible testimony of special agents of the Drug Enforcement Administration ("DEA"), state and local law enforcement agencies, and the production of reliable evidence, the following facts:

On February 22, 2008, at approximately 5:30 a.m., St. John the Baptist Sheriff's Office officers executed a Louisiana state court authorized search warrant at 125 N.W. 12th Street, Reserve, Louisiana, which was the residence of Kendell Jackson. Upon entering the residence, officers immediately encountered six adult females, five juveniles, and one adult male. Upon reaching the entrance to the back room of the house, which is the portion of the residence controlled and occupied by Kendell Jackson, officers encountered a locked door. Officers then broke down the door and inside that back room they encountered Kendell Jackson, who was arrested and read his Miranda rights. Officers then proceeded through the back door to that room that led to a kennel area for

numerous pit bull dogs, which was accessible only from that backroom. In the kennel area, officers found approximately 93 grams of crack cocaine and two firearms, a Smith and Wesson, .38 caliber Airweight pistol, bearing serial number BSA0635 and a Beretta, model 84 BB 9mm pistol, bearing serial number D07165, both which traveled in and affected interstate commerce. In total, during the course of the search, agents recovered approximately 286.06 grams of cocaine (93 grams of which was cocaine base), 145.78 ounces of marijuana, drug paraphernalia, e.g., scales, approximately \$10,000 in cash. The material suspected of being cocaine base and cocaine hydrochloride was sent to a DEA laboratory for testing. That testing confirmed that the material consisted of 72.2 grams of cocaine base and 188.6 grams of cocaine hydrochloride.

Previously, Jackson was convicted of a felony on June 3, 1999, in St. John the Baptist Parish Criminal District Court, Case No. 96124, for drug racketeering, in violation of LA. R.S. 15:1353.

On February 26, 2008, DEA Special Agents Chad Scott and Scott Cunningham, and others, conducted a voluntary interview of Kendell Jackson after Jackson waived his Miranda rights. During that interview, Kendell Jackson stated that the drugs found during the search were received from a supplier in Houston. Kendell Jackson further outlined his pattern of drug purchases from that supplier. Specifically, Jackson stated that he purchased anywhere from two and a quarter ounces of cocaine to four and a half ounces of cocaine from Forest for the past several months. Jackson also identified his source of supply for marijuana.

READ AND APPROVED:

SEAN TOOMEY
Assistant United States Attorney

DATE

GEORGE TUCKER
Counsel for Defendant Kendell Jackson

DATE

KENDELL JACKSON
Defendant

DATE